UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC RECORDING CORPORATION; ARISTA MUSIC, fka BMG MUSIC; CAPITOL RECORDS LLC fka CAPITOL RECORDS, INC.; ELEKTRA ENTERTAINMENT GROUP INC.; INTERSCOPE RECORDS; LAFACE RECORDS LLC; MOTOWN RECORD COMPANY, L.P.; PRIORITY RECORDS LLC; SONY MUSIC ENTERTAINMENT, fka SONY BMG MUSIC ENTERTAINMENT, fka SONY BMG RECORDINGS, INC.; VIRGIN RECORDS AMERICA, INC.; and WARNER BROS. RECORDS INC.,

06 Civ. 05936 (KMW) ECF CASE

Plaintiffs.

v.

LIME WIRE LLC; LIME GROUP LLC; MARK GORTON; and M.J.G. LIME WIRE FAMILY LIMITED PARTNERSHIP,

Defendants.

PLAINTIFFS' NOTICE OF MOTION AND MOTION TO FILE CONFIDENTIAL MATERIAL UNDER SEAL

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Date: December 23, 2010

NOTICE TO THE COURT, DEFENDANTS AND THEIR COUNSEL OF RECORD:

Pursuant to the Protective Order entered in this action on March 8, 2007, Plaintiffs hereby move

this Court to place under seal, until further order of this Court, the following documents:

• Plaintiffs' Motion to Issue Letter of Request for International Judicial

Assistance (England)

• Exhibit 1 to Plaintiffs' Motion to Issue Letter of Request for International

Judicial Assistance (England): Letter of Request for International Judicial

Assistance (Michael Rogers)

On motion of the parties, the Court entered a Stipulated Protective Order (the "Protective

Order") on March 8, 2007, concerning information produced in discovery, a copy of which is on

file with the Court (Dkt. 21). The above-referenced documents contain material that has been

designated by the parties as either Confidential or Confidential-Attorney's Eyes Only under the

Protective Order. Paragraph 14 of the Protective Order requires a party submitting Confidential

or Confidential-Attorney's Eyes Only material to the Court to file such material under seal to

protect it from disclosure. Accordingly, Plaintiffs respectfully request that the foregoing

documents be maintained under seal until further order of this court.

Dated: December 23, 2010

Respectfully submitted

/s/ Kelly M. Klaus

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